

Exhibit 2



Planet Depos®
We Make It *Happen™*

CONFIDENTIAL

Transcript of Jean-Pierre Biard

Date: January 25, 2023

Case: Legalforce RAPC Worldwide -v- Legalforce, Inc.

Planet Depos

Phone: 888-433-3767

Fax: 888-503-3767

Email: transcripts@planetdepos.com

www.planetdepos.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION
- - - - - x
LEGALFORCE RAPC WORLDWIDE, P.C., :
Plaintiff, :
v. : Case No.
LEGALFORCE, INC., a Japanese : 3:22-cv-03724-TLT
corporation, :
Defendant. :
- - - - - x

CONFIDENTIAL

Deposition of
JEAN-PIERRE BIARD
Tokyo, Japan
Wednesday, January 25, 2023
10:26 a.m. Japan Standard Time (UTC+9)

Job No.: 478532
Pages: 1 - 156
Reported By: M. Allred, RPR

CONFIDENTIAL

Transcript of Jean-Pierre Biard

January 25, 2023

2

1 Deposition of JEAN-PIERRE BIARD, conducted
2 at the offices of:

3
4 U.S. EMBASSY IN JAPAN - TOKYO

5 1-10-5 Akasaka

6 Minato-ku, Tokyo 107-8420

7 Phone: +81-03-3224-5000
8
9

10 Pursuant to notice, before M. Allred,
11 Registered Professional Reporter.
12
13
14
15
16
17
18
19
20
21
22
23
24
25

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

CONFIDENTIAL

Transcript of Jean-Pierre Biard

January 25, 2023

3

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

A P P E A R A N C E S

ON BEHALF OF PLAINTIFF:

RAJ ABHYANKER, ESQUIRE
LEGALFORCE RAPC WORLDWIDE P.C.
1580 W. El Camino Real, Suite 10
Mountain View, CA 94040
Phone: +1-650-390-6461

ON BEHALF OF DEFENDANT:

NAOKI YOSHIDA, ESQUIRE
FINNEGAN, HENDERSON, FARABOW, GARRETT &
DUNNER, LLP
33rd Floor, Shiroyama Trust Tower
3-1, Toranomom 4-chome
Minato-ku, Tokyo, Japan 105-6033
Phone: +81-3-3431-6943

CONFIDENTIAL

Transcript of Jean-Pierre Biard

January 25, 2023

7

1 MR. ABHYANKER: So you blanket designated
2 the entire transcript and contents?

3 MR. YOSHIDA: Yes, for now. For now.

4 MR. ABHYANKER: All right. Yeah. We object
5 to that, but we'll agree to that for now.

6 MR. YOSHIDA: Okay. And second is that
7 Mr. Biard is here to testify in his personal
8 capacity, and the subject matter is limited to
9 jurisdiction. So I'm not going to reserve objection
10 as to relevance.

11 I'm going to instruct him not to respond to
12 anything unrelated to the jurisdiction issues.

13 MR. ABHYANKER: Well, you can't instruct him
14 not to respond. You can -- you can certainly raise
15 the objection. He can respond. And then we will
16 preserve the argument for the judge later on.

17 MR. YOSHIDA: That's fine. That's fine.

18 And last one is that also I'm not going to
19 reserve the objection with respect to highly
20 confidential matters. I understand that the motion
21 is pending currently. So that we'll not going to be
22 reserving objections as to the highly confidential
23 information, including business confidential
24 information, highly confidential -- highly sensitive
25 business information, and trade secret information

CONFIDENTIAL

Transcript of Jean-Pierre Biard

January 25, 2023

64

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 Q Were they a potential customer for your
25 products?

CONFIDENTIAL

Transcript of Jean-Pierre Biard

January 25, 2023

65

1 A So we were at that time looking for advice
2 and insight on their thoughts as to the relevance of
3 our product for the US market.

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

CONFIDENTIAL

Transcript of Jean-Pierre Biard

January 25, 2023

92

1

2

3

4

5

6

7

8

9

10

11

12

13

Q So is a product that your company sells
called "LegalForce Cabinet"?

15

A We have -- one of the product that is sold
in Japan is called LegalForce Cabinet. Yes.

17

Q And the other product is called LegalForce?

18

A Correct.

19

Q And those names still are used?

20

A Those marketing names are still used. Yes.

21

Q In Japan?

22

A Correct.

23

Q But you stopped using those names in the
United States?

25

A We never used those names --

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

CONFIDENTIAL

Transcript of Jean-Pierre Biard

January 25, 2023

121

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

[REDACTED]

[REDACTED]

Q Did LegalForce ever advertise as expanding to the United States using the "LegalForce" name?

A It -- LegalForce, the Japanese entity, never advertised an expansion under the LegalForce name.

Q Into the United States?

A Into the United States. So -- okay.

Q Did LegalForce ever advertise employment opportunities for engineers saying that they're going to expand to the United States using the "LegalForce" name?

A So there was advertising, so a job search, a job posting done -- so the answer is no. Not using that name for the United States.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

CONFIDENTIAL

Transcript of Jean-Pierre Biard

January 25, 2023

132

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 Q I'm asking can you explain why this would
20 show an image that it seems to be a slide on
21 June 24th with an American flag with the name
22 "LegalForce"? Can you explain it? Yes or no? It's
23 a yes-or-no question.
24 A In exact detail, I cannot confidently
25 explain the intent. I can state that the Japanese

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

CONFIDENTIAL

Transcript of Jean-Pierre Biard

January 25, 2023

133

1 company never said or intended to enter the US under
2 the LegalForce name.

3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]